

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATION OF CHASE OIL
CORPORATION FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 24214

CHASE'S PRE-HEARING STATEMENT

Chase Oil Corporation ("Chase" or "Applicant"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Chase Oil Corporation
("Chase")

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

In this case, Chase seeks an order pooling all uncommitted interests in the San Andres formation (WC 16S27E32; San Andres [98371]) underlying a standard 160-acre, more or less, horizontal well spacing unit comprised of the W/2 W/2 of Section 29, Township 16 South, Range 27 East, NMPM, Eddy County, New Mexico. Chase proposes to dedicate the above-referenced spacing unit to the proposed initial **Anchorage Federal Com #1H** well, to be horizontally drilled from a surface location in the NW/4 NW/4 (Unit D) of Section 32, with a first take point in the

SW/4 SW/4 (Unit M) of Section 29 and a last take point in the NW/4 NW/4 (Unit D) of Section 29. The completed interval for the well will comply with statewide setbacks for oil wells. Chase has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

APPLICANT’S PROPOSED EVIDENCE


WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Derik Smith, Landman	Self-Affirmed Statement	Approx. 4
Charles Sadler, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Chase intends to present this case by self-affirmed statement at hearing if unopposed.

Respectfully submitted,

HOLLAND & HART LLP

By: 
 Michael H. Feldewert
 Adam G. Rankin
 Paula M. Vance
 Post Office Box 2208
 Santa Fe, NM 87504
 505-988-4421
 505-983-6043 Facsimile
 mfeldewert@hollandhart.com
 agrankin@hollandhart.com
 pmvance@hollandhart.com

ATTORNEYS FOR CHASE OIL CORPORATION

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 323183

QUESTIONS

Operator: MACK ENERGY CORP P.O. Box 960 Artesia, NM 882110960	OGRID: 13837
	Action Number: 323183
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>